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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Brian Maurice Brown

Case:2:15-mj-30572

Judge: Unassigned,

Filed: 12-03-2015 At 03:19 PM

SEALED MATTER (LH)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of December 2, 2015, in the county of Wayne
in the Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT



Continued on the attached sheet.


Complainant's signatureKeith McGreevy, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: December 3, 2015
Judge's signatureCity and state: Detroit, MichiganMona K. Majzoub, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Keith McGreevy, being duly sworn, depose and state the following:

INTRODUCTION

1. Your affiant is currently employed as a Special Agent (S/A) with the Department of Justice, Drug Enforcement Administration (DEA) and has been so employed for the past 15 years. Prior to employment with the DEA, your affiant spent 5 years as a Police Officer in Illinois. During this time your affiant has conducted and has been involved in conducting numerous investigations relating to the manufacture and distribution of cocaine and other controlled substances. Your affiant has attended schools and has been instructed in many aspects of narcotics investigation and is familiar with the laws promulgated under Title 21 of the United States Code. Your affiant is aware of the following information from numerous sources included but not limited to, your affiant's observations and participation in the investigation, your affiant's review and analysis of oral and written reports, information received from witness interviews and information obtained from reliable sources of information (SOI). The affiant states as follows.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including communications with others

who have personal knowledge of the events and circumstances described herein, oral and written reports about this investigation which your affiant received, directly or indirectly from law enforcement personnel, information gained through my training and experience; and seizure of a weapon.

3. The information outlined below is provided for the limited purpose of establishing probable cause, and does not contain all details or all facts which exist pertaining to this investigation. This affidavit is provided in support of an application for a complaint and an arrest warrant of Brian Maurice BROWN, date of birth (DOB) XX/XX/1969. Your affiant believes BROWN violated Title 18, United States Code, Section 922(g) (felon in possession of a firearm).

4. I am currently involved in an investigation of a subject identified as Brian Maurice BROWN a/k/a Peanut, DOB XX/XX/1969, who currently resides in Detroit, Michigan. This investigation concerns BROWN and violations of Federal firearms laws.

INVESTIGATION & PROBABLE CAUSE

5. On December 01, 2015, the Honorable Magistrate Judge Mona Majzoub of the Eastern District Court of Michigan, authorized a search warrant for the residence of 8601 West Parkway, Detroit, Michigan, a residence utilized by Brian BROWN.

6. On December 02, 2015, agents assigned to the Detroit DEA executed the Federal search warrant at 8601 West Parkway, Detroit, Michigan. Upon entry into the residence, agents encountered the occupants, Sabrina LEWIS, who is BROWN's girlfriend, and BROWN's new born baby.

7. Prior to searching the residence, Sabrina LEWIS advised SA Edward Donovan that BROWN had departed the residence 45 minutes prior to agents' arrival and that BROWN sleeps in the master bedroom where his clothes and personal belonging were later located.

8. During a search of the master bedroom, agents and officers located clothing and shoes belonging to Brian BROWN along with a commercial money counter, drug packaging materials, documents bearing the name Brian BROWN and latex gloves.

9. Additionally, agents located and seized a loaded .40 caliber Smith and Wesson semi-automatic handgun bearing serial number HEZ0029 (which was partially obliterated) from the top of the nightstand in the master bedroom.

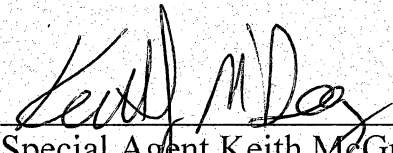
10. According to records obtained from the Law Enforcement Information Network (LEIN), the aforementioned handgun was reported stolen in Mason County, West Virginia.

11. On the same date, SA Donovan interviewed Sabrina LEWIS, who stated that the Smith and Wesson handgun was not hers and that the weapon belongs to BROWN. LEWIS also denied ownership of the commercial money counter and the drug packaging materials. LEWIS stated that she and BROWN have had a romantic relationship since she was 18 years old and that she and BROWN recently had their first child together. LEWIS stated that when BROWN is not in Atlanta with his wife, he resides with LEWIS at the residence.

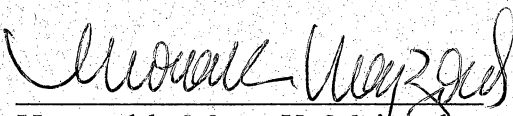
12. A computerized criminal history check of BRIAN BROWN, DOB XX/XX/1969, revealed that he has felony conviction for: Conspiracy and Possession with Intent to Deliver Cocaine in the Eastern District of Michigan. Based on this conviction BROWN was sentenced to 120 months in Federal Prison and to five years of supervised release.

13. On December 3, 2015, I contacted Bureau of Alcohol, Tobacco, Firearms and Explosives Nexus Expert Special Agent Curtis Brunson regarding the status of the firearm. Special Agent Brunson stated that, based on the descriptions provided, without physically examining the firearms, the firearms were manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

14. Based on the above facts, I have probable cause to believe that Brian BROWN, a convicted felon, did knowingly and intentionally possess a firearm, a .40 caliber Smith and Wesson semi- automatic handgun, serial number HEZ0029, which traveled in and affected interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1) on December 02, 2015, in the County of Wayne, Eastern Judicial District of Michigan.


Special Agent Keith McGreevy
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
this 3rd day of December, 2015.


Honorable Mona K. Majzoub
U. S. Magistrate Judge